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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 IN RE: UBER TECHNOLOGIES, INC.,
 14 PASSENGER SEXUAL ASSAULT
 15 LITIGATION

16 _____
 17 This Document Relates to:

18 *Jane Doe LS 333 v. Uber Technologies, Inc., et*
 19 *al.*, Case No. 3:23-cv-05930-CRB

20 *Jane Doe LS 397 v. Uber Technologies, Inc., et*
 21 *al.*, Case No. 3:24-cv-05864-CRB

22 Case No. 3:23-md-03084-CRB

23 **LEVIN SIMES PLAINTIFFS' MOTION TO**
CHANGE TIME TO COMPLY WITH
COURT'S ORDER CONCERNING NON-
BONA-FIDE RIDE RECEIPTS

24 Judge: Hon. Charles R. Breyer
 25 Hearing Date: October 31, 2025
 26 Time: 10:00 a.m.
 27 Courtroom: 6 – 17th Floor

1 **I. INTRODUCTION**

2 Plaintiffs with MDL IDs 1194 and 2350, represented by Levin Simes LLP, respectfully
 3 move pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 6-3 for a three-week
 4 extension of time to comply with the Court's September 9, 2025 Order to Show Cause (Dkt.
 5 3876).

6 Good cause exists for this modest extension. Levin Simes is currently in trial in the first
 7 bellwether case in the parallel Judicial Council Coordinated Proceeding concerning sexual assaults
 8 in Ubers, representing our client, Jane Doe LSA 78. That trial commenced on September 8, 2025,
 9 and is scheduled to conclude on September 25, 2025. We anticipate post-trial briefing to follow.
 10 The demands of that bellwether trial prevent counsel from adequately addressing the discovery
 11 issues raised in the Court's Order within the timeframe established by the order.

12 An extension of three weeks will allow counsel to complete their trial obligations,
 13 investigate the authenticity issue more fully, and possibly take steps that would render portions of
 14 the Court's Order moot. Uber has refused to stipulate to this extension, necessitating the present
 15 motion.

16 **II. STATEMENT OF FACTS**

17 On September 9, 2025, the Court issued an Order to Show Cause directed to Plaintiffs with
 18 MDL IDs 1194 and 2350, requiring, among other things, production of native versions of ride
 19 receipts with metadata, production of related communications, and submission to limited
 20 depositions concerning authenticity. (Dkt. 3876.)

21 Levin Simes LLP represents those Plaintiffs. As set forth in the accompanying declaration,
 22 counsel also represents the plaintiff in the first bellwether trial in the parallel JCCP concerning
 23 sexual assaults in Ubers. Levin Decl., at ¶ 3. That trial began September 8, 2025, and is expected
 24 to conclude September 25, 2025, with post-trial briefing anticipated shortly thereafter. *Id.* at ¶ 3.

25 Our firm asked counsel for Uber for a three-week extension, pointing to the ongoing trial.
 26 *Id.* at ¶ 5; Exh. A to Levin Decl. Uber refused. *Ibid.*

27 **III. ARGUMENT**

28 Federal Rule of Civil Procedure 6(b) authorizes the Court to extend deadlines for good

cause. Civil Local Rule 6-3 requires the moving party to identify the reasons for the requested modification, all prior modifications, and the effect on the schedule.

Good cause is present here. The overlap of the JCCP trial makes compliance with the existing deadlines impracticable. A three-week extension will not unduly prejudice Uber or disrupt the overall schedule of this MDL, but it will permit counsel to investigate the authenticity issues more fully and potentially moot the need for further proceedings under the Order.

7 | IV. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court extend by three weeks the deadlines set forth in the September 9, 2025 Order to Show Cause (Dkt. 3876) as to Plaintiffs with MDL IDs 1194 and 2350, such that:

- The deadline to produce native receipts and metadata is extended from **September 23, 2025** to **October 14, 2025**;
 - The deadline to produce related documents and communications is extended from **September 23, 2025** to **October 14, 2025**; and
 - The deadline to appear for a deposition regarding authenticity is extended from **October 9, 2025** to **October 30, 2025**.

20 | DATED: September 12, 2025

Respectfully Submitted,

LEVIN SIMES LLP

/s/ William A. Levin

William A. Levin

Laurel L. Simes

David M. Grimes

Samira J. Bokaie

Attorneys for LS Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ William A. Levin
William A. Levin

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